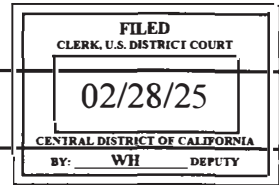


LIST OF EXHIBITS AND WITNESSES

Case Number	ED23-515-HDV-JPRx	Title	EDGAR SOLIS VS. STATE OF CALIFORNIA; AND MICHAEL BELL				
Judge	Hernán D. Vera, U.S. District Judge						
Dates of Trial or Hearing	02/18/25; 02/19/25; 02/20/25; 02/24/25; 02/25/25; 02/26/25; 02/27/25; 02/28/25						
Court Reporters or Tape No.	Maria Bustillos						
Deputy Clerks	Wendy Hernandez						
Attorney(s) for Plaintiff(s) / Petitioner(s)			Attorney(s) for Defendant(s) / Respondent(s)				
Dale Galipo			DAG David Klehm				
Marcel Sincich			DAG Tammy Kim				
Trenton Packer							
Plaintiff(s) or Petitioner(s)			Defendant(s) or Respondent(s)				
Ex. No.	Id.	Ev.	Ex. No.	Id.	Ev	EXHIBIT DESCRIPTION / WITNESS	Called By
12	02/18/25					Portions of deposition of Deft Bell read into the record	Plaintiff
90-2	02/18/25					Statement discussed with Deft Bell	
						Portions of Deposition of Witness Marlene Sue Biggs	Defendants
						into the record- pages 6-8	
						six-second camera video of deputy played by plaintiff	Plaintiff
						on 02/19/25 - no exhibit # provided	
						Plaintiff's deposition read into the record	Pltf & Defts
						pages 45,191, 193	
			220	02/25/25	02/25/25	1 page physical photograph of video exh 120	Deft



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Attorneys for Plaintiff EDGAR SOLIS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Case No.: 5:23-cv-00515-HDV-JPR

[Honorable Hernán D. Vera]

**PLAINTIFF'S SECOND AMENDED WITNESS
LIST**

Final Pretrial Conference:

Date: October 8, 2024

Time: 10:00 a.m.

Trial:

Date: October 29, 2024

Time: 09:00 a.m.

Place: Courtroom 10D

EDGAR SOLIS,

Plaintiff,

v.

STATE OF CALIFORNIA; and MICHAEL BELL,

Defendant.

TO ALL PARTIES, BY AND THROUGH THEIR ATTORNEYS OF RECORD:

Plaintiff Edgar Solis hereby serves the following list of witnesses which he may call during trial, as Plaintiff's Second Amended Witness List. Plaintiff reserves the right to supplement and/or amend this list.

Below reflects approximate times for examination.

Respectfully Submitted,

DATED: January 27, 2025

**LAW OFFICES OF DALE K. GALIPO
LAW OFFICES OF GRECH & PACKER**

By: /s/ Marcel F. Sincich
Dale K. Galipo
Marcel F. Sincich
Trent C. Packer
Attorney for Plaintiff

Plaintiff's Witness List

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Edgar Solis Plaintiff	Mr. Solis will testify as to his perception of the events leading up to the shooting incident, the shooting incident, and his damages. His testimony is unique as a personal account that he was not an immediate threat to any person.	45 min – 1 hr.	2 hours	2/24/25
Michael Bell Defendant, Officer, California Highway Patrol	Officer Bell is likely to testify as to his perception of the incident, information known, tactics used, the deadly force used against plaintiff, and plaintiff's damages, including punitive damages. Officer Bell's testimony is unique as the defendant who used force against plaintiff.	1 hr. 15 min – 1 hr. 30 min	1 hr. 30 min.	2/19/25, 2/19/25
Patrick Sobaszek Detective, City of Hemet Police Department	Detective Sobaszek is likely to testify as to his perception of the incident, tactics used before and after the use of deadly force, and plaintiff's damages. Detective Sobaszek's testimony is unique as an eyewitness to defendant's second volley of shots, and who took the same path as defendant and plaintiff prior to the shots.	45 min	45 min.	
Arthur Paez Sergeant, City of Hemet Police Department	Sergeant Paez is likely to testify as to his perception of the incident, the tactics before and after the use of deadly force, and plaintiff's damages. Sgt. Paez's testimony is unique as the leader of the team, who sent the information about plaintiff to the team, and who witnessed the shooting of plaintiff by Deputy Waltermire.	30 – 45 min	45 min.	
Salvador Waltermire	Deputy Waltermire is likely to testify as to his perception of the incident, the tactics used before and	45 min	30 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Deputy, County of Riverside Sheriff's Department	after the use of deadly force, and plaintiff's damages. Deputy Waltemire's testimony is unique as an officer who used force against plaintiff prior to his flight and used deadly force against plaintiff after Defendant used deadly force against plaintiff.			
Gary Adams GLA Investigations, Plaintiff's Expert	Mr. Adams is plaintiff's investigation expert who will testify as to his scene assessment and photographs taken; observations on scene; what can and cannot be seen as demonstrated with assistant and dummy gun.	30 – 40 min	45 min	2/19/25; 2/20/25
Roger Clark Police Procedures Consultant, Inc., Plaintiff's Expert	Roger Clark is Plaintiff's single police practices expert who will testify as to his opinions rendered in this case based on his knowledge and experience in law enforcement and his review of materials in this case. Mr. Clark's testimony is unique as plaintiff's only witness to explain basic law enforcement training and the POST standards as it relates to this case, including vehicle and patrol operations, de-escalation, tactics, and the use of force and deadly force. Mr. Clark will opine on the use of deadly force standards, and the appropriateness of the use of deadly force under the circumstances of this case; hypothetical questions based on the evidence of the case; and his understanding of the forensic and physical evidence presented in this case.	1 hr.	1 hr. 30 min	2/20/25; 2/24/25
Dr. Ryan O'Connor Emergency Medical Physician, Plaintiff's Expert	Dr. O'Connor is plaintiff's sole medical expert in this case who will testify as to plaintiff's injuries, treatment, damages, pain and suffering, summary of nearly nine thousand pages of medical records, and care likely to be required in the future.	45 min – 1 hr.	45 min	2/24/25

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Brett Fisher AMR crew member and paramedic	Mr. Fisher was the primary care crew member on the ambulance that treated Mr. Solis on scene and provided care during emergency transport to the hospital, and has information related to Mr. Solis' injuries, complaints, vital signs, symptoms, treatment and cost.	30 min	45 min	2/24/25
Balaji, Anupama, P&S non-retained expert provider	Dr. Balaji will testify includes knowledge of and interaction with Plaintiff as treating physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
Agapian, John, MD non-retained expert provider	Dr. Agapian will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
Downing, Stephanie, MD non-retained expert provider	Dr. Downing will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	2/24/25

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Jaden Schlig Eyewitness	Mr. Schlig will testify as to his observations on scene as an eyewitness to portions of the incident from 633 Hillmer Dr.	20 min	20 min	2/19/25
Marlene Sue Biggs Eyewitness	Ms. Biggs will testify as to his observations on scene as an eyewitness to portions of the incident from 634 Hillmer Dr.	20 min	20 min	2/19/25
Richard Contla Eyewitness	Mr. Contla will testify as to his observations on scene as an eyewitness to portions of the incident from 622 Taschner Dr.	20 min	30 min	
*Olin, Nicholas, MD non-retained expert provider	Dr. Olin will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
*Park, Heesung, MD non-retained expert provider	Dr. Olin will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
*Powers, Bret, DO non-retained expert provider	Dr. Powers will testify includes knowledge of and interaction with Plaintiff as attending Emergency Room physician, including but not limited to the	30 min	30 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.			
*Stout, Benton, PA non-retained expert provider	Dr. Stout will testify includes knowledge of and interaction with Plaintiff as treating physician, including but not limited to the evaluation, signs and symptoms, treatment and procedures including why such were performed, diagnosis, prognosis, treatment plan, and cost of care for Plaintiff regarding Plaintiff's gunshot wounds.	30 min	30 min	
*Jennifer Jernegan	Lead Forensic Evidence Supervisor, Riverside County Sheriff's Department. Involved prepared a scaled 3D diagram and incident investigation and collection of evidence.	20 min	20 min	
*Ashley Cary	Forensic Technician II, Riverside County Sheriff's Department. Involved in charting of officers; photographs of Solis at hospital; scene investigation, and evidence photographs.	20 min	20 min	
*Vanderfeer	Forensic Technician II, Riverside County Sheriff's Department. Photographed scene on Taschner.	20 min	20 min	
*Yesika Alvarado	Forensic Evidence Technician, Riverside County Sheriff's Department. Went to scene with Investigators Medoza and Cline; photographed 604 Hillmer; photographed cul-de-sac; completed Faro Laser Scanner scans of scene; collected evidence assisted by Torres; prepared a scaled 3D diagram.	20 min	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
*Monique Torres	Forensic Technician II; went to scene with Investigators Medoza and Cline to collect and chart evidence; prepared a scaled 3D diagram	20 min	20 min	
*Sienna Knoll	Forensic Technician II; photographed and processed the Mustang	20 min	20 min	
*Daniel Cline	Deputy, Riverside County Sheriff's Department. Involved in evidence collection, numbering, and description; photographed 604 Hillmer; photographed cul-de-sac; and scanner data.	20 min	20 min	
*Daniel Moody	Detective, Riverside County Sheriff's Department. Involved in scene evidence collection and photography.	20 min	20 min	
*D. Sandoval	Investigator; Riverside County Sheriff's Department. Involved in area canvass and investigation.	20 min	20 min	
*S. Anderson	Investigator; Riverside County Sheriff's Department. Involved in area canvass and investigation.	20 min	20 min	
*Custodians of Records	Custodians of records regarding Plaintiff's medical records and bills may be called is necessary to lay any foundation required.			

*Indicates that a witness will be called only if the need arises.

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Attorneys for Defendant State of California,
10 *acting by and through the California Highway*
Patrol (erroneously sued as "State of California")
11 *and Michael Bell*

12 IN THE UNITED STATES DISTRICT COURT
13
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA
15
16

17 **EDGAR SOLIS,**

18 Plaintiff,

19 v.

20 **COUNTY OF RIVERSIDE; STATE**
21 **OF CALIFORNIA; SALVADOR**
22 **WALTERMIRE; and DOES 1-10,**
inclusive,

23 Defendants.
24
25
26
27
28

5:23-cv-00515-HDV-JPR

**DEFENDANTS' SIXTH AMENDED
WITNESS LIST**

Date: February 18, 2025

Time: 9:00 a.m.

Courtroom: 10D

Judge: The Honorable Hernan
D. Vera

Trial Date: February 18, 2025

Action Filed: 2/02/2023

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants State of California, acting by and through the California Highway Patrol, and Michael Bell hereby serve the following list of witnesses who may be called during trial. Defendants reserve the right to supplement or amend this list.

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Michael Bell, Defendant, CHP Officer	Officer Bell is the defendant and will testify about his interactions with Plaintiff, training and experience with the CHP.	1.25		
Patrick Sobaszek, Detective, Hemet Police Department	Detective Sobaszek will testify about his interactions with and observations of Plaintiff and incident, police tactics used, training and experience as a law enforcement officer, including in SWAT and on the Gang Task Force. Sobaszek is unique in that he was an eyewitness to various portions of the incident and heard and observed events, including from different angles or perspectives, that others may not have similarly observed.	45 mins	45 mins	2/25/25
Salvador Waltermire, Deputy, Riverside County Sheriff's Department	Deputy Waltermire will testify about his interactions with and observations of Plaintiff and incident, including the third volley of shots, police tactics used, and his training and experience as a law enforcement officer.	45 mins	30 mins	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	Waltermire is unique in that he was an eyewitness to various portions of the incident and heard and observed events, including from different angles or perspectives, that others may not have similarly observed.			
Arthur Paez, Sergeant, Hemet Police Department	Sergeant Paez will testify about his knowledge of Plaintiff, communications with the Gang Task Force concerning Plaintiff, and observations of Plaintiff and the incident, including the third volley of shots, police tactics used, as well as experience as a law enforcement officer. Paez is unique in that he was an eyewitness to various portions of the incident and heard and observed events, including from different angles or perspectives, that others may not have similarly observed.	30-45 min.	45 min.	2/25/25
M. Vargas, Lieutenant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Operations. Involved in post-shooting investigation and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
D. Harris, Sergeant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Sergeant and knowledge of Defendant Bell's	45 minutes	45 min	2/25/25

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	tactical training.			
C. Hamilton, Lieutenant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Leader. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	1 hour	1 hr	
J. Kawanaka, Sergeant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Lead Administrative Investigator. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	45 minutes	45 min	2/26/25
Daniel Moody, Detective	Riverside County Sheriff Department involved in the subsequent scene control or incident investigation and plaintiff's blood sample.	45 minutes	45 min	
J. Manjarrez, Detective	Riverside County Sheriff Department officials. Collected white bag of powdery substance from plaintiff's car suspected fentanyl and blood sample.	30 minutes	30 min	
A. Dittfurth, Deputy	Riverside County Sheriff Department official involved in the incident investigation. Surveillance video from 642 Taschner Drive and plaintiff's firearm forensic analysis.	30 minutes.	30 min	
Daniel Cline, Deputy	Riverside County Sheriff Department official involved in the incident investigation,	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	obtained pictures, DNA swab, and Scanner data.			
D. Sandoval, Investigator	Riverside County official involved in the incident investigation, involved in area canvass and investigation.	20 min.	20 min.	
S. Anderson, Investigator	Riverside County official involved in the incident investigation, involved in area canvass and investigation.	20 min.	20 min.	
Jennifer Jernegan, Lead Forensic Evidence Supervisor	Riverside County Sheriff Department official involved in the incident investigation.	20 minutes	20 min	
Yesika Alvarado, Forensic Evidence Technician	Riverside County Sheriff Department official involved in the incident investigation. Captured pictures of scene, bullet holes and charted plaintiff's firearm.	40 minutes	40 min	2/25/25
A. Carey, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of scene and plaintiff in hospital and first aid supplies and clothing.	20 minutes	20 min	
Venderfees, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of pursuit termination at 632 Taschner Drive	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	and point of rest of plaintiff's car and carport damage.			
Monique Torres, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Went to scene to collect and chart evidence; prepared a scaled 3D diagram.	20 min	20 min	
Sienna Knoll, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Photographed and processed the Mustang.	20 min.	20 min.	
Esteban Carranza, Investigator	Riverside County District Attorney's Investigator involved in the criminal investigation of the incident.	30 minutes	30 min	
J. Gonzalez, Lieutenant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent scene control or incident investigation.	30 minutes	30 min	
D. Maddox, Sergeant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent incident investigation.	30 minutes	30 min	
G. Gomez, Detective	Hemet Police Department Officer involved in the incident investigation.	20 minutes	20 min	
Amy Lim	Riverside University Health System hospital laboratory	15 minutes	15 minutes	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	sample collection of blood and urine from Plaintiff at hospital on date of incident.			
RN Joeallen*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
Valenzuela, Paola RN*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
Otteson, Lisa Christine RN*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
McGuire, Bailey RN*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
Wilson, Stephen*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
Richard Doria, Nurse*	Riverside University Health System hospital nurse regarding sample collection of blood and urine from plaintiff at hospital on date of incident.	15 min.	15 min.	
Rogers, Shana Lee NP*	Riverside University Health System hospital nurse	15 min.	15 min.	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	regarding sample collection of blood and urine from plaintiff at hospital on date of incident.			
Wallace, Bradley MD*	Riverside University Health System hospital provider regarding blood samples, and urine sample drug abuse screen of plaintiff at hospital on date of incident.	15 min.	15 min.	
Gonzalez, Reyna Teresa MD*	Riverside University Health System hospital provider regarding blood samples, and urine sample drug abuse screen of plaintiff at hospital on date of incident.	15 min.	15 min.	
Downing, Stephanie Rae, MD*	Riverside University Health System hospital provider regarding urine sample drug abuse screen of plaintiff at hospital on date of incident.	20 mins.	20 mins.	
Albini, Paul Thomas, MD*	Riverside University Health System hospital provider regarding blood samples of plaintiff at hospital on date of incident.	20 mins.	20 mins.	
Custodian of Records*	Riverside University Health System hospital witness concerning the urine sample and blood samples collected from plaintiff on date of incident.	20 mins.	20 mins.	
Kristen Steward, M.S., D-ABFT-FT	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood	30 minutes	30 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	obtained from Plaintiff.			
Ola Bawardi, M.S.	Bio-Tox Laboratories Personnel involved in blood sample testing obtained from Plaintiff.	30 minutes	30 minutes	
A. Beckham*	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood obtained from Plaintiff.	15 minutes	15 minutes	
Greg Meyer, Captain (Ret.)	Police Practices Expert will explain POST standards from basic law enforcement training and use of force tactics applicable to facts of this case.	2 hours	1 hr, 15 min – 1 hr 30 min	2/26/25
Parris Ward, Forensic Video Analyst	Forensic video/audio analyst. Will testify regarding his assessment of BWC footage and security cameras near the shooting location and information that can be derived in relation to incident shooting.	1 hour	45 min	2/25/25
Ronald Kvitne, M.D.	Board certified orthopedic surgeon medical expert will testify about his review and analysis of plaintiff's medical records as they pertain to Plaintiff's injuries including further treatment.	45 minutes	30-40 min	
Michael Ritter, M.D.	Emergency Medicine expert will testify about his review and analysis of plaintiff's Toxicology drug results positive for methamphetamine and PCP and other medical records	1 hour	45 min	2/25/25

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	pertaining to Plaintiff's injuries.			
Leslie Martinez	Resident of the property where the incident occurred who heard yelling and gunshots.	20 minutes	20 min	
Marlene Sue Biggs	Resident who observed 2-3 officers chase a male adult and heard gunshots	20 minutes	20 min	
Jose Jesus Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Ana Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Liliana Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Pearo Rodriguez	Resident who provided surveillance video from camera mounted to front of residence	20 minutes	20 min	
Florina Maria Mandujano	Resident who provided surveillance video from camera	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	mounted to front of residence			
Thomas Jordan	Resident who provided surveillance video from camera mounted to front of residence	15 minutes	15 min	
Nidia Santana	Resident who provided surveillance video from camera mounted to front of residence	15 minutes	15 min	
Richard Contla	Resident who heard a crashing sound and observed the suspect jump over an east wall. Then heard one of the officers yell, "He's got a gun" followed by numerous gunshots and shouting. Mr. Contla recognized suspect, having seen him in the area before the incident.	30 minutes	30 min	
Kathy Lynn Cassel	Resident of the area where the suspect collided with the Kia Sorrento causing damage to the Kia, support post for the parking stall awning and block wall	20 minutes	20 min	
Jaden Schlig	Resident and eyewitness to portions of incident from 633 Hillmer Drive.	20 min	20 min	
Trinidad Rueta	Resident and eyewitness to portions of incident from 603 Hillmer Drive.	20 min	20 min	2/25/25

1 Dated: February 14, 2025

Respectfully submitted,

2 ROB BONTA

Attorney General of California

3 DONNA M. DEAN

Supervising Deputy Attorney General

4 DAVID KLEHM

Deputy Attorney General

5 TAMMY KIM

Deputy Attorney General

6 /s/ Tammy Kim

7
8 *Attorneys for Defendants State of*
9 *California, acting by and through the*
10 *California Highway Patrol*
(erroneously sued as "State of
California") and Michael Bell

11 *Indicates that witness will be called only if the need arises.

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Attorneys for Defendant STATE OF CALIFORNIA and MICHAEL BELL

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

EDGAR SOLIS,

Plaintiff,

v.

STATE OF CALIFORNIA; and
MICHAEL BELL.

Defendants.

Case No.: 5:23-cv-00515-HDV-JPR

[*Honorable Hernán D. Vera*]
Magistrate Judge Jean P. Rosenbluth

**SECOND AMENDED JOINT
EXHIBIT LIST**

Trial:

Date: February 18, 2025

Time: 09:00 a.m.

Place: Courtroom 10D

1 **TO ALL PARTIES, BY AND THROUGH THEIR ATTORNEYS OF**
2 **RECORD:**

3 Plaintiff Edgar Solis and Defendants State of California and Michael Bell
4 hereby submit the following objections to exhibits which they may utilize during
5 trial. The parties reserve the right to supplement and/or amend these objections to
6 exhibits.

7
8 Respectfully Submitted,

9 DATED: February 18, 2025

LAW OFFICES OF DALE K. GALIPO
LAW OFFICES OF GRECH & PACKER

10
11 By: /s/ Marcel F. Sincich
12 ~~Dale K. Galipo~~
13 Marcel F. Sincich
14 Trent C. Packer
15 *Attorney for Plaintiff Edgar Solis*

16 DATED: February 18, 2025

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19 ~~DAVID KLEHM, Deputy Attorney General~~
20 TAMMY KIM, Deputy Attorney General
21 *Attorneys for Defendants State of California (by*
22 *and through the California Highway Patrol) and*
23 *Michael Bell*

OBJECTIONS TO EXHIBIT RE. JOINT EXHIBIT LIST

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
Photographs				
1.	Sgt. Paez Deposition Exhibit 1	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801, Not hearsay; impeachment of Defendant; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	1-4 2/19/25 ✓ all 2/26/25
2.	Sgt. Paez Deposition Exhibit 2	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE	FRE 801, Not hearsay; impeachment of Defendant; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	2/19/25 ✓ all

¹ Plaintiff and Defendants reserve the right to object portion of documents listed in the following joint exhibit list that are objectionable pursuant to FRE 401, 403, 404, and 801.

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		602 & 611 speculation, lacks foundation.		
3.	Det. Sobaszek Deposition Exhibit 3	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801, Not hearsay; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	
4.	Det. Sobaszek Deposition Exhibit 4	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801, Not hearsay; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	
5.	Photographs of Off. Bell	Objection to the first two	Accurately depicts Defendant Officer	5-3 2/18/25 ✓

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(AGO 727, 729, 731)	paragraphs, AGO 727, AGO 729. FRE 403, unduly prejudicial, cumulative.	Bell and what he was wearing at the time of the incident.	
6.	Photograph of Off. Bell Gun (AGO 687)			2/25/25 ✓
7.	Maps Marked by Officer Bell (AGO 335-336)	Objection. These markings on maps are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801(d)(2)(a), Party opponent admission. Relevant to Defendant's testimony and claimed description of the incident.	7-1 2/19/25 ✓ 7-2 2/19/25 ✓
8.	Det. Sobaszek Deposition Exhibit 8			
9.	Photographs of Sgt. Paez (AGO 630, 750)			
10.	Photographs of Det. Sobaszek (AGO 643, 645)			
11.	Photographs of Dep. Waltermire (AGO 693, 698)			
12.	Photographs of Dep. Waltermire Gun (AGO 684)			
13.	Photographs of Stealth Explorer (AGO 530)			2/18/25 13-1 ✓

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
14.	Photographs of Green Mustang (AGO 547-48, 550, 552, 595)			14-1 2/18/25 ✓
15.	Photographs of 633 Hillmer (AGO 658, 666)			
16.	Scene and Evidence Photographs (AGO 799, 800, 802, 805, 813, 816-17, 820, 852-53, 855, 857, 869, 874-75, 877, 881, 887-89, 891-92, 896, 901, 950, 953, 955-57, 960, 963, 965, 967-68, 970, 974-75, 978-79, 981, 986-87, 989, 991, 993-96, 1001, 1003-05, 1012, 1015, 1020, 1022, 1027-30, 1032, 1034-36, 1038, 1042-43, 1047-49, 1067, 1069, 1071, 1082-88, 1092-96, 1098, 1100-01, 1103-04, 1106, 1110, 1113, 1117-24, 1126, 1129-33, 1135, 1137, 1139, 1142-44, 1146, 1148, 1161, 1163, 1165-66, 1173-82, 1185-88, 1190-91, 1195, 1197-99, 1203-05, 1207-19)	note: 16-20 ✓ 16-22 ✓ 16-28 ✓ 16-45 ✓ 16-49 ✓ 16-52 ✓ all re-admitted on 2/25/25	1.	16-21 ✓ 2/18/25 16-20 ✓ 2/18/25 16-22 ✓ 2/19/25 16-28 ✓ 2/19/25 16-30 ✓ 2/19/25 16-45 ✓ 16-46 ✓ 16-47 ✓ 16-48 ✓ 16-49 ✓ 16-50 ✓ 16-51 ✓ 16-27 ✓ 2/19/25 16-28 ✓ 16-23 ✓ 16-24 ✓ 16-74 ✓ 2/19/25 ✓16-62 2/20/25 ✓16-68 2/20/25 ✓16-52 2/25/25 ✓16-10 2/25/25 ✓ ✓16-31 2/25/25 ✓
17.	(Reserved)			
18.	Photos of Plaintiff in Hospital			18-3 2/24/25 ✓

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(AGO 765-66, 1221-33)			
19.	Photographs of Plaintiff's Injuries (P 144, 416-20, 456, 478-79, 512, 2456-60, 5462, 5501-03, 5541-43)			✓ 19-1 } 2/26/24 ✓ 19-11 } 2/24/25 ✓ 19-14 } ✓ 19-15 } 2/24/25 ✓ 19-7 }
20.	Photographs of Edgar Solis (P 4064-4084) <i>*20-18 NOT ADMITTED</i>	FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Relevant to damages, not outweighed by prejudice; foundation to be given by Plaintiff.	20-6 } 2/24/25 20-13 } 20-18 20-8 } 2/24/25
21.	(Reserved)			
22.	(Reserved)			
23.	GLA Investigation Scene Photographs (produced in Expert Disclosures)	Objection to term Scene Assessment as these were not taken at the scene on the date of the incident. These are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701-704.	Relevant as accurate description of scene not provided by investigators reports; relevant and not hearsay as impeachment of Defendant Bell's testimony; no hearsay included; foundation given by Plaintiff's investigator who conducted the scene assessment.	23-1 ✓ 23-8 ✓ 23-13 ✓ 23-3 ✓ 23-15 ✓ 23-16 ✓ 23-29 ✓ 2/19/25 23-34 ✓ 23-35 ✓ 23-36 ✓ 23-32 ✓ 23-33 ✓ 23-9 2/19/25
Videos				
24.	603 Hillmer Front Yard Video	Defendants reserve their right to object	Plaintiff reserves the right to	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(relevant portions of AGO 504)	to this exhibit because plaintiff has not provided the "relevant portions" of this exhibit.	respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
25.	Screenshots from 603 Hillmer Video	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	25-1 2/25/25 ✓
26.	614 Hillmer Front Yard Video 1 (relevant portions of AGO 514)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the "relevant portions" of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	26-36 all 26 2/26/25
27.	Screenshots from 614 Hillmer Front Yard Video 1	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	27-3 2/19/25 ✓
28.	614 Hillmer Back Yard Video 1 (relevant portions of AGO 524)	Defendants reserve their right to object to this exhibit because plaintiff has not provided	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		the "relevant portions" of this exhibit.	portions of videos as necessary based on testimony given.	
29.	Screenshots from 614 Hillmer Back Yard Video 1	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	29-1 2/19/25 ✓
30.	Deputy Waltermire BWC Video (relevant portions of AGO 506)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the "relevant portions" of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	2/20/25 ✓
31.	Deputy Waltermire Video 00:00-00:15			
32.	Deputy Waltermire Video 01:05-01:40			
33.	Deputy Waltermire Video 01:40-12:58			
34.	Screenshots from Deputy Waltermire BWC Video	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
35.	Sergeant Paez BWC Video (relevant	Defendants reserve their right to object	Plaintiff reserves the right to	Pg 3 only 2/18/25 ✓ All 35 2/20/25

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	portions of AGO 507)	to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
36.	Sergeant Paez Video 01:20-02:00			
37.	Sergeant Paez Video 02:00-06:13			
38.	Screenshots from Sergeant Paez BWC Video	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	38-4 ✓ 2/19/25 38-5 2/20/25
39.	614 Hillmer Front Yard Video 2 (relevant portions of AGO 518)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
40.	Screenshots from 614 Hillmer Front Yard Video 2	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
41.	614 Hillmer Front	Defendants reserve	Plaintiff reserves	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	Yard Video 3 (relevant portions of AGO 512)	their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
42.	Screenshots from 614 Hillmer Front Yard Video 3	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
43.	614 Hillmer Back Yard Video 2 (relevant portions of AGO 519)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
44.	Screenshots from 614 Hillmer Back Yard Video 2	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
45.	614 Hillmer Back Yard Video 3 (relevant portions of AGO 521)	Defendants reserve their right to object to this exhibit because plaintiff	Plaintiff reserves the right to respond. Plaintiff only plans to	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		has not provided the "relevant portions" of this exhibit.	admit relevant portions of videos as necessary based on testimony given.	
46.	Screenshots from 614 Hillmer Back Yard Video 3	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
Plaintiff's Medical Records				
47.	RUHS Medical Records (P 2,7-16, 18-35, 43-44, 67-81, 98-109, 117-26, 135-37, 144, 334-77, 408-11, 416-20, 438-41, 451-54, 456, 460-63, 467-70, 478-79, 483-86, 489-92, 496-99, 512, 517-19, 523, 529-32, 551-52, 609-11, 623, 625-62, 725, 728, 822, 936-37, 939, 2437, 2456-60, 2463, 2465, 2502, 2507, 2510, 2593, 2596, 2597)		47-33 ✓ identification only 2/24/25	
48.	Riverside Medical Records (P 2622, 2705, 2714-2718, 2738)			
49.	(Reserved)			
50.	High Desert Medical Records			

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(P 2884)			
51.	CDCR Medical Records (P 4531, 4562, 4569, 5162-5164, 5210-12, 5215-16, 5225-26, 5228-5229, 5240-41, 5265, 5406-5409, 5431, 5444, 5450, 5362, 5501-03, 5541-43, 6567, 6591, 8896-8899)			
52.	AMR Records (selected from P 8890-8903)	FRE 403 FRE 403 unduly prejudicial. Plaintiff just produced these on September 20. Defendants have not had an opportunity to depose the third parties referenced in these records.	Plaintiff produced these records shortly after they were received. Defendants were on notice that there was emergency medical case, there is no prejudice suffered, yet highly relevant to damages.	2/24/25 all ✓
53.	High Desert Imaging (P 4085)			
54.	RUHS Imaging (P 4086)	54-10 ADM 2/24/25 Identified only ✓	54-6 ADM 2/24/25 ✓ 54-12 ADM 2/24/25 ✓	54-1 ✓ 2/24/25 54-2 ✓ 2/24/25
For Impeachment / Refresh Recollection / Demonstrative *				
55.	RCSD Report by Deputy Cline re 614 N. Hillmer Dr. (relevant portions of COR 1008-1031)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the "relevant portions" of this exhibit.	For impeachment or to refresh recollection as indicated; relevant portions to be used as necessary based on testimony given.	
56.	Officer Bell CIIT	Objection.	For impeachment	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	Statement (relevant portions of AGO 497)	Confidential compelled statement of a Law Enforcement Officer.	or to refresh recollection as indicated; does not qualify for a confidential designation.	
57.	Transcript of Officer Bell CIIT Statement (relevant portions AGO 68-161) <i>Identified only m 2/19/25 ✓</i>	Objection. Confidential compelled statement of a Law Enforcement Officer.	For impeachment or to refresh recollection as indicated; does not qualify for a confidential designation.	
58.	Officer Bell CHP Statement (relevant portions of AGO 500)	Objection. Confidential compelled statement of a Law Enforcement Officer.	For impeachment or to refresh recollection as indicated; does not qualify for a confidential designation.	
59.	Transcript of Officer Bell CHP Statement (relevant portions AGO 162-192) <i>2/26/25 59-22 identified only</i>	Objection. Confidential compelled statement of a Law Enforcement Officer.	For impeachment or to refresh recollection as indicated; does not qualify for a confidential designation.	
60.	Deputy Waltermire Statement (relevant portions of AGO 499)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
61.	Transcript of Deputy Waltermire Statement (relevant portions of AGO 193-248)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	

Ex. #	Description	Objection¹	Response to Objection	Date Admitted
62.	Officer Sobaszek Statement (relevant portion AGO 501)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
63.	Transcript of Officer Sobaszek Statement (relevant portions of AGO 294-300)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
64.	Sgt. Paez Statement (relevant portions of AGO 502)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
65.	Transcript of Sgt. Paez Statement (relevant portions of AGO 301-334)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
66.	Demonstrative Yellow Dummy Gun	Objection This is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Listed as demonstrative. Not hearsay. Not testimonial.	
67.	Demonstrative Fence	Objection. This is inflammatory and	Listed as demonstrative.	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		inaccurate. Objection This is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Not hearsay. Not testimonial.	
68.	Demonstrative Scene Assessment Measurements (produced in Expert Disclosures)	Objection to term Scene Assessment as these were not taken at the scene on the date of the incident. These are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701-704.	Relevant as accurate description of scene not provided by investigators reports; relevant and not hearsay as impeachment of Defendant Bell's testimony; foundation given by Plaintiff's investigator who conducted the scene assessment.	
69.	Demonstrative Maps	Untimely disclosure. These are demonstratives, which were untimely disclosed,	Defendants are not unduly prejudiced by Google maps images accurately depicting the	

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Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		and not evidence. L.R. 16-3; FRCP 26; FRE 403 cumulative; FRE 611 speculation, lacks foundation.	scene as demonstrative evidence to orient the jury to the location of the incident.	

DEFENDANTS' ADDITIONAL EXHIBITS

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
100.	Composite Video 1 of Multiple individual homeowner videos and BWC videos	FRE 401, 403, 801; untimely, FRCP 26.	Timely disclosed in Parris Ward's expert report; no prejudice to Plaintiff; relevant; helpful to jury. This exhibit is simply a composite of the videos listed by Plaintiff and Defendants as separate exhibits.	
101.	Composite Video 2 of Multiple individual homeowner videos and BWC videos	FRE 401, 403, 801; untimely, FRCP 26.	Timely disclosed in Parris Ward's expert report; no prejudice to Plaintiff; relevant; helpful to jury. This exhibit is simply a composite of the videos listed by Plaintiff and Defendants as separate exhibits.	2/25/25 ✓
102.	Critical Incident Investigation - C22-601-001 [AGO 1-7]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
			11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
103.	Summary of Incident [AGO 10-13]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008). Corroborates	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
			defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
104.	Scene Description [AGO 14]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
105.	Plaintiff's October 23, 2024, Deposition Exhibit 6-1.			2/24/25 ✓
106.	Crime Scene Evidence Collection	P MIL 1. FRE 801 hearsay.	Official Record. FRE 803(8)(A)(i)	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
	& Storage [AGO 43]	FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
107.	Injury Descriptions [AGO 44]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
108.	Plaintiff's October 23, 2024, Deposition Exhibit 2	Plaintiff restates and incorporates by reference all objections made therein. FRE 403.	Relevant and admissible as statement by party opponent, prior statement, and/or for impeachment. FRCP 33(c); FRE 801(d).	
109.	Maps [AGO 335-336]	FRE 801 hearsay.	Official Record. FRE 803(8)(A)(i) and (iii).	